Remarks

Following the above amendments, claims 1-20 are pending in this application. The examiner has objected to claims 1, 10, and 12 due to certain informalities in the claims.. The examiner has also rejected claims 1-14 under 35 U.S.C. § 112 as being indefinite. The examiner has rejected claims 1-14 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,894,571 to O'Connor. The examiner has rejected claims 1-14 under 35 U.S.C. 103(a) as being obvious over U.S. Patent No. 6,446,243 to Huang et al.

The claims of the pending application concern a method for installing and assigning installation locations for hardware components in a computer system. It is contemplated that the hardware components may include, for example, expansion cards, controllers, modems, network cards, and memory cards, among other hardware components.

A. Claims Objections and Section 112 Rejections

Claims 1-3 and 9-14 have been amended to cure the claim informalities that form the basis of the examiner's objections and Section 112 rejections. In view of these amendments, applicants respectfully submit that the objections and rejections of claims 1-14 should be withdrawn.

B. O'Connor Does not Anticipate the Claimed Invention

Applicants respectfully submit that O'Connor does not anticipate the claims as amended herein. Applicant has amended claim 1 herein. Claim 1 now includes the step "displaying in graphical form" in place of the step "identifying in graphical form." This amendment to claim 1 clarifies that the installation locations are not simply identified, but are displayed in graphical form for the person assembling the computer system.

Applicant respectfully submits that O'Connor does not disclose the step of

displaying installation locations in graphical form. The examiner has identified in O'Connor disclosure concerning "a list of hardware configuration components" (O'Connor col. 2, lines 41-44 and 53-54; col. 3, line 3; col. 4, lines 46-50, and col. 5 line 7). A list of hardware components is not the same as a display of *installation locations*. Displaying in graphical form the assigned installation locations of the components of a computer system is distinct from merely listing the components of the computer system. It is plain that displaying assigned installation locations in graphical form is not anticipated by a listing of components.

The U.S. Patent and Trademark Office has recognized that O'Connor does not disclose the step of displaying assigned installation locations in graphical form. In an office action for the parent application, Examiner Herng-Der Day found that O'Connor does not disclose the step of displaying assigned installation locations in graphical form:

> O'Connor discloses expressly neither the details of assigning hardware installation locations nor the details of displaying a graphical representation of the installation locations of the hardware components of the computer system.

(Exhibit A, p. 7). The office action is attached as Exhibit A. Because O'Connor fails to disclose each element of claim 1, O'Connor does not anticipate claim 1. The examiner's rejection of claim 1 on anticipation grounds should be withdrawn.

Each of independent claims 10 and 12 include similar claim elements. The computer system of claim 10 is manufactured according to a series of method steps, including the method step of "displaying in graphical form the assigned installation locations of the hardware components of the computer system." Claim 12 is directed to a method of assigning installation locations of a computer system and includes the step of "displaying a graphical representation of the installation locations of the hardware components of the computer system." As explained

above with respect to claim 1, and as previously recognized by Examiner Day in the U.S. Patent and Trademark Office, the claim element of displaying in graphical form the assigned installation locations of the components of a computer system is not disclosed in O'Connor. Because O'Connor does not disclose each element of independent claims 1, 10, and 12, the rejection of these claims on anticipation grounds should be withdrawn.

C. The Claimed Invention Is Not Obvious Over Huang

Huang does not render the claimed invention obvious. Applicants respectfully submit that a prima facie case of obviousness has not been established on the basis of Huang and that a rejection of the pending claims on obviousness grounds is improper. Importantly, Huang does not disclose or suggest each element of the pending claims.

A prima facie case of obviousness requires a showing that all of the claim limitations of the rejected claims are taught or suggested by the prior art. Manual of Patent Examining Procedure 2143 and 2143.03. The establishment of a prima facie case of obviousness requires that *all* the claim limitations be taught or suggested by the prior art. MPEP 2143.01 (emphasis added). "All words of a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 U.S.P.Q. 494, 496 (CCPA 1970).

Applicants respectfully submit that Huang is not directed to the same technology as the invention of the present application and is silent on several matters of Applicants' claims. Huang teaches a method for functional verification of VLSI circuit designs involving the use of reusable functional blocks or intellectual property cores. The method disclosed in Huang is used as an "aid in chip design verification during integration and testing." Applicant's invention, however, is not directed at chip design verification, but is instead directed at determining and

displaying compatible installation locations for the assembling of hardware components in a computer system. Applicants respectfully disagree with any conclusion that chip design verification is any manner tantamount to selecting and displaying installation locations for hardware components in a computer system.

With respect to the limitations of pending claims, independent claim 1 includes the method step of "displaying in graphical form the assigned installation locations of hardware components of the computer system following the successful evaluation of the compatibility of the hardware components." This method step is not disclosed or suggested by Huang. The examiner has identified the following passage in Huang as providing the disclosure for this claim element.

> Integration phase follows, in which separately developed blocks are assembled functionally and verified as a whole, for example, as shown in FIG. 3, whereby sub-blocks are integrated as system or chip design.

(col. 4, lines 42-46). It is plain that this passage of Huang does not disclose the *display* of assigned installation locations of hardware components. At best, this passage of Huang discloses the global verification of functional sub-blocks of a system. There is absolutely no mention in Huang of *where* these sub-blocks are to be installed in a computer system, and there is likewise no mention of the step of *displaying* the installation locations of these sub-blocks.

Moreover, the blocks in Huang are not hardware components, but are instead functional blocks, which are representations of computational functions. (See Huang col. 3, lines 32-35). Furthermore, Figure 3 of Huang "illustrates integration process in which *functional blocks* are pieced together, and signals extend to/from externally to chip." (col. 3, lines 55-57). Stated in another way, Figure 3 of Huang only shows a representation of the interactions of

computational functions. It does not display any hardware components or the assigned installation locations of hardware components. Finally, evaluating the compatibility of hardware components is not disclosed in Huang. The verification of functional blocks taught by Huang refers only to verifying whether the functional blocks by themselves and together perform the desired computational functions. Huang does not disclose the step of determining if any one hardware component is compatible with any other hardware component.

Each of independent claims 10 and 12 include similar claim elements and is likewise not obvious over Huang. The computer system of claim 10 is manufactured according to a series of method steps, including the method step of "displaying in graphical form the assigned installation locations of the hardware components of the computer system." Claim 12 is directed to a method of assigning installation locations of a computer system and includes the step of "displaying a graphical representation of the installation locations of the hardware components of the computer system." As explained above with respect to claim 1, the claim element of displaying in graphical form the assigned installation locations of the components of a computer system is not disclosed in Huang. Because Huang does not disclose or suggest each element of independent claims 1, 10, and 12, the rejection of these claims on obviousness grounds should be withdrawn.
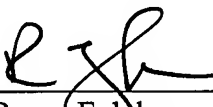
D. Dependent Claims 2-9, 11, 13-20

Dependent claims 2-9, 11, and 13-20, including new claims 15-20, will not be discussed individually herein, as each of these dependent claims depends, either directly or indirectly, from an otherwise allowable base claim.

Conclusion

The applicants respectfully submit that pending claims 1-20 of the present invention are allowable. The applicants respectfully request that the rejection of these claims be withdrawn and that these claims be passed to issuance.

Respectfully submitted,

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